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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New  
York non-profit corporation, and WR PROPERTY  
LLC, a New Jersey limited liability company,

Civ. No. 3:17-DV-03226

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,  
MICHAEL REINA, ROBERT NIXON, HELENE  
SCHLEGEL, JEFFREY PURPURO, WILLIAM  
CAMPBELL, and KENNETH PIESLAK,

Defendants.

**DECLARATION OF GERSHON KLEIN**

GERSHON KLEIN declares as follows, pursuant to 28 U.S.C. § 1746:

1. I live at 26 London Drive in Jackson Township, New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am a member of Agudath Israel.
4. My religious beliefs prohibit me from pushing a stroller or a wheelchair or carrying food, medication, canes, water bottles, house keys, personal identification, books, prayer shawls and/or reading glasses outside of my home on the Sabbath and on holy days, unless there is an *eruv*, an area enclosed by a wire boundary that symbolically extends the private domain of Jewish households into public areas.
5. I live a 15 minute walk from shul.
6. There is no *eruv* in my neighborhood and Jackson has passed an ordinance prohibiting the installation of an *eruv*.
7. The lack of an *eruv* hampers my ability to practice my religious beliefs in multiple ways, including:
  - a. My 3 year old and my 4 month old can't walk to shul so because there is no *eruv*, my wife can't attend on Shabbos and holy days. It is my religious belief that my 4 year old should attend a portion of services with me on Shabbos and holy days. Because my wife cannot carry our 4 month old or push a stroller, she cannot bring my 4 year old to shul for a portion of the day.
  - b. Because there is no *eruv*, we also can't go to my sister's house, a few blocks away from me, for a Shabbos or holy day meal because we cannot push my 4 month old in a stroller on these days.

- c. It is my religious belief that I must study with others on the sabbath. Without an *eruv* I cannot carry my books to shul. By not being able to carry my books, it hampers my ability to pray and study. I also can't carry an umbrella if it is raining.
- d. It is also traditional to have a *kiddush* (celebratory meal) at shul the shabbos after a girl is born. Because we don't have an *eruv*, we, and our neighbors with children or elderly relatives who must be carried or pushed in a stroller or wheelchair, cannot attend those ritual celebrations. I had to have a limited *kiddush* in celebration of my daughter at shul. Because there is no *eruv*, my wife was unable to attend the *kiddush* in honor of her own daughter.

8. The ordinances prohibiting an *eruv* do not affect my neighbors who are not Orthodox Jews because they are permitted to push strollers and travel to their houses of worship and families with or without an *eruv*. The prohibition on the *eruv* only affects Orthodox Jews.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 7, 2019



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GERSHON KLEIN